

WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Thomas B. Rupp (#278041)  
(trupp@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Bankruptcy Case No. 19-30088 (DM)

**PG&E CORPORATION,**

Chapter 11

**- and -**

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO SIXTEENTH SECURITIES  
CLAIMS OMNIBUS OBJECTION (NO LOSS  
CAUSATION – SECURITIES SOLD PRIOR  
TO THE FIRST PURPORTED  
“CORRECTIVE DISCLOSURE”) AND  
REQUEST FOR ORDER BY DEFAULT AS  
TO UNOPPOSED OBJECTIONS**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

[Re: Dkt. No. 11483]

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

**Resolving Objections Set for Hearing  
December 7, 2021 at 10:00 a.m. (Pacific Time)**

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1 amount and priority, and the basis for the Reorganized Debtors' objection with respect to the applicable  
2 claim to be disallowed and expunged.

3 The deadline to file responses or oppositions to the Sixteenth Securities Claims Omnibus  
4 Objection has passed. The Reorganized Debtors have not received any formal or informal responses.

5  
6 **DECLARATION OF NO OPPOSITION RECEIVED**

7 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

8 1. I am a partner with the law firm of Weil, Gotshal & Manges LLP ("**Weil**"), counsel for  
9 the Reorganized Debtors.

10 2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined  
11 that no responses have been filed with respect to the Sixteenth Securities Claims Omnibus Objection.

12 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and  
13 expunging the proofs of claim listed in the column headed "Claim to be Disallowed/Expunged" in  
14 **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Sixteenth Securities  
15 Claims Omnibus Objection.

16 Dated November 30, 2021

17 **WEIL, GOTSHAL & MANGES LLP**

18 **KELLER BENVENUTTI KIM LLP**

19 By: /s/ Richard W. Slack

20 Richard W. Slack

21 *Attorneys for Debtors and Reorganized Debtors*  
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